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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:)	
VITRO, S.A.B. de C.V.,)	Chapter 15
Debtor in a Foreign Proceeding.)	Case No. 11-33335-hdh-15
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VITRO, S.A.B. de C.V.,)	
Plaintiff,)	Adversary No. 11-03342-hdh
v.)	
ACP MASTER, LTD.; AD HOC GROUP OF VITRO NOTEHOLDERS; AURELIUS CAPITAL MASTER, LTD.; AURELIUS CONVERGENCE MASTER, LTD.; ELLIOTT INTERNATIONAL L.P.; THE LIVERPOOL LIMITED PARTNERSHIP; and DOES 1- 1000,)	NOTICE OF EMERGENCY MOTION FOR ENTRY OF PROTECTIVE ORDER REGARDING PRODUCTION OF CERTAIN CORRESPONDENCE BELONGING TO SENIOR MANAGEMENT OF VITRO S.A.B. DE C.V.
Defendants.)	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law (the “Memorandum of Law”) in Support of an Emergency Motion for Entry of Protective Order Regarding Production of Certain Correspondence Belonging to Senior Management of Vitro, S.A.B. de C.V. (the “Motion”) and the supporting Declarations of Thomas J. Matz and Licenciado Antonio Lozano Gracia, together with the attached exhibits, Alejandro Francisco Sánchez-Mujica, as the Foreign Representative of Vitro, S.A.B. de C.V. (“Vitro SAB”), the debtor in (i) a voluntary judicial reorganization proceeding commenced on December 13, 2010 under the *Ley de Concursos Mercantiles* and currently pending before the Federal District Court for Civil and Labor Matters for the State of Nuevo León in the United Mexican States, and (ii) the above-captioned chapter 15 case, and the plaintiff in the above-captioned adversary proceeding, will move this Court, before the Honorable Harlin D. Hale of the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, 1100 Commerce Street, Dallas, Texas, 75242-1496, Room 1421 (Courtroom 1), on June 2, 2011 at 2 p.m. (CDT), pursuant to Federal Rule of Civil Procedure 26(c) and Federal Rules of Bankruptcy Procedure 7026(c) and 9014, for a protective order, substantially in the form attached hereto as Exhibit A, providing, *inter alia*, that certain documents requested by Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Convergence Master, Ltd., Elliott International L.P., The Liverpool Limited Partnership, Wilmington Trust FSB, and non-party Crédit Agricole Corporate and Investment Bank may be produced by Vitro SAB subject to certain limited protections designed to preserve privileges afforded to senior management of Vitro SAB under the Constitution of the United Mexican States and such other further relief as the Court deems just and proper.

Objections, if any, to the Motion, shall be filed and served on the undersigned by no later than June 1, 2011.

The basis for the Motion is set forth in the accompanying Memorandum of Law.

Dated: May 26, 2011

THOMPSON & KNIGHT LLP

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the parties via the Court's electronic notification system on this 26th day of May, 2011.

/s/ Katharine E. Battaia
Katharine E. Battaia